## BEFORE THE POSTAL RATE COMMISSION

RECEIVED

Aug 25 9 36 AM '97

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 1997** 

**DOCKET NO. R97-1** 

SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS DANIEL (UPS/USPS-T29-17)

(August 25, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Daniel (UPS/USPS-T29-17).

Respectfully submitted,

John E. McKeever Albert P. Parker

Stephanie Richman

Attorneys for United Parcel Service

Schnader Harrison Segal & Lewis LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103-7286 (215) 751-2200

and 1913 Eye Street, N.W., Suite 600 Washington, D.C. 20006-2106

(202) 463-2900 Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS DANIEL

UPS/USPS-T29-17. Please refer to line 27 on page 12 of your testimony.

Please provide a copy of the original decision analysis report on the Integrated Material Handling System ("IMHS") and all deviations, supplements, amendments, and

modifications thereto.

**CERTIFICATE OF SERVICE** 

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

John E. McKeever

Dated: August 25, 1997

Philadelphia, Pa.